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October 4, 2013

Ohio Environmental Protection Agency  
Division of Emergency and Remedial Response  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Attention: Mr. Edwin Lim, Ohio EPA, DERR Section Manager

Reference: Canton Drop Forge Southway Property  
TRC Project No. 196663.0000  
Ohio EPA Technical Assistance ID # 276-000130-002

Dear Mr. Lim:

Thank you for speaking with me on October 2. As you know, TRC Environmental Corp. (TRC) was engaged by Canton Drop Forge (CDF) in 2012 to assist CDF with environmental compliance and participation in the Ohio Voluntary Action Program (VAP) for the CDF property located at 4575 Southway Street SW, Canton, Ohio.

CDF has been proactive in taking measures to prevent future oil releases to the ponds as well as to clean-up earlier releases. In September 2012, CDF entered the Property into the RCRA and Ohio Voluntary Action Program Memorandum of Agreement Track (RCRA and VAP MOA Track) and has expended considerable effort toward addressing site conditions under that program. TRC's Ohio Certified Professional (CP), Donald Fay, is serving as the VAP project manager.

TRC began field work under the VAP in October 2012, completed a Draft VAP Phase I Property Assessment (PA) in March 2013 and a VAP Phase II PA in May 2013. The VAP work included the collection and analysis of numerous soil, ground water, sediment, and pond water samples in accordance with the RCRA and VAP MOA Track. Based upon the VAP Phase II, a Remedial Action Plan (RAP) was developed dated May 2, 2013 which presents applicable standards to be achieved following implementation of the remedy.

The applicable standards are site-specific risk-based concentrations of total petroleum hydrocarbons and polynuclear aromatic hydrocarbons that are protective of complete exposure pathways for the pond sidewalls and bottom materials. These documents have been previously provided to both USEPA and Ohio EPA and are enclosed here for your review.

In conjunction with site investigation and remediation activities, CDF has made significant progress finalizing plans for process modifications to eliminate the release of process water and oil to the on-site storm water retention ponds. The process modifications include:

- Installation of a larger oil-water separator (OWS) with a higher hydraulic retention time and more robust oil separation technology to treat the flow of process water generated from forge hammers and other miscellaneous forge processes.
- Installation of an oil storage tank with secondary containment for temporary storage of oil collected from the new OWS.
- Water processed through the new OWS will be pumped to CDF's existing water reclaim system for reuse as cooling water or as boiler feed water. Excess recycled water will be discharged to the Stark County Sanitary Sewer with ultimate discharge to the City of Massillon's Waste Water Treatment Plant (WWTP).
- Current non-contact cooling water overflows will be reused or diverted and pumped to CDF's boiler system.
- Installation of three storm water-oil separators at three primary storm water pipelines prior to their discharge to CDF's on-site storm water retention ponds. These separators will capture and treat only storm water; **no process water will be discharged to the ponds.**

Additionally, the following progress has been made toward site investigation and pond remediation:

- Dewatering of Ponds 1 and 2 has continued in preparation for remediation of the oil-impacted sidewalls and bottom material.
- The heating fuel underground storage tanks located in the west storage yard (east of Upsetter Building) were removed in July 2013. During the tank excavation, the only area identified on the property with elevated concentrations of trichloroethene (TCE) in soil was removed and disposed offsite at a licensed landfill.
- Ground water monitoring from the property well network and two production wells is continuing. The next sampling event is scheduled for December 2013.

The remediation of Pond 1 and Pond 2 will begin as soon as the OWS and process water improvements are on-line.

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The enclosed reports (provided on CD) include the following documents:

- VAP Phase I Property Assessment (March 28, 2013)
- *Draft* VAP Phase II Property Assessment (May 2, 2013)
- Remedial Action Plan (May 2, 2013)

We will arrange a conference call in the next week to discuss the process going forward with you. A copy of this letter is being sent as a courtesy to USEPA, which recommended that we contact you, and to those members of the Ohio EPA Legal Section who have been involved with this matter.

If you have any questions, comments, or require additional information you may reach me at (216) 344-3072 ([kteuscher@trcsolutions.com](mailto:kteuscher@trcsolutions.com)) or Mr. Donald A. Fay (Certified Professional) at (513) 489-2255 ([dfay@trcsolutions.com](mailto:dfay@trcsolutions.com)).

Respectfully,

**TRC Environmental Corporation**



Kathleen R. Teuscher  
Risk Assessor/Project Manager



Donald A. Fay, C.P.  
Vice President

Enclosures

cc: Sean Denman, CDF  
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